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REMARKS

Upon entry of this Response, claims 1, 3, 6-8, 10, 13-15, 17, 20-22, 24-27, 29-32, and 34-36 remain pending in the present application. Claims 1, 6-8, 13-15, 20-22, 27, and 32 have been amended, claims 2, 4, 5, 9, 11, 12, 16, 18, 19, 23, 28, and 33 have been canceled. Applicant requests reconsideration of the pending claims in view of the following remarks.

Claims 1-21 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication 2001/0052901 A1 filed by Parekh et al. (hereafter "Parekh"). Anticipation under §102 "requires the disclosure in a single prior art reference of each element of the claim under construction. W.L. Gore and Associates, Inc. v. Garlock, Inc., 220 USPQ 303, 313 (Fed. Cir. 1983). Applicant reasserts that the rejection of claims 1-21 is improper for the reasons that follow.

Claim 1 has been amended to provide for the following:

1. A system for generating a graphical user interface (GUI), comprising:

- a processor circuit having a processor and a memory;
- GUI generation logic stored on the memory and executable by the processor, the GUI generation logic comprising:
 - logic to find at least one section in a template, the section being identified by a pair of section tags and a plurality of input items nested between the section tags, each of the input items being identified by input field tags;
 - logic to generate at least one section heading associated with the section in a graphical user interface, the at least one section heading being comprised of text included in the section tags;
 - logic to generate an input field in the graphical user interface for each one of the input items, the input fields being generated in association with the at least one section heading; and
 - logic to automatically label each of the input fields in the graphical user interface with a content of an associated one of the input field tags in the template.

As set forth above, claim 1 provides for logic that finds a section in a template that is identified by the existence of a pair of section tags and a plurality of nested input items between the section tags. Also, claim 1 provides for generating a section heading associated with a section in graphical user interface (GUI) where the section heading is comprised of text included in the section tags themselves. Similarly, claim 1 specifies a number of input fields in the GUI that are generated in association

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with the section heading. Also, the input fields are automatically labeled with a content of their associated input field tags from the template.

Applicant respectfully asserts that Parekh fails to show or suggest the elements of claim 1 as amended. Specifically, the Office Action has cited portions of Parekh that fail to show or suggest the use of text taken from a section tag and from an input field tag that is then used to label fields in a user interface. Specifically, the Office Action states: "Parekh then goes further to display the logic with the content from the input field tags in templates clearly showing the input fields and the text that will be displayed along with these input fields provided as a label (Figure 1)."

Applicant respectfully disagrees. Figure 1 of Parekh does not show a graphical user interface and it does not show how text from section tags and input field tags is used as labels in the graphical user interface.

In addition, the Advisory Action of March 11, 2004 states:

Furthermore, the tags shown in these template files represent definition information used for defining the input field with additional attributes, such as "NAME", wherein this "NAME" attribute would be used for labeling the input field (page 6, paragraph 94).

Applicants respectfully disagree. Paragraph 94 of Parekh specifically states:

"[0094] Attributes—this keyword is used when defining syntax to represent zero or more attributes within a tag. For example, the <INPUT> tag has the attributes TYPE, NAME, VALUE, SIZE, MAXLENGTH, CHECKED, and ALIGN. The general syntax for it would be <TAG Attributes> ("<TAG Attributes> text" if text is to follow to tag as is in the case of <INPUT TYPE="radio">). This is mapped into Syntax2 in the "Supported Syntax" section."

Applicant asserts that this section says nothing about whether an attribute in a tag is to be used for labeling an input field. Rather, this excerpt only describes "Attributes" as a keyword that is understood by a "Screen Template Generator", not that the actual text of a tag is used as a label in a graphical user interface as claimed. Assertions that such is the case assume too much.

Accordingly, Applicant requests that the rejection of claim 1 as amended be withdrawn. In addition, claims 8 and 15 have been amended in a manner similar to claim 1 above. Accordingly, Applicant requests that the rejection of claims 1, 8, and 15 be withdrawn.

In addition, it is noted that claims 3, 6, and 7; 10, 13, and 14; and 17, 20, and 21 depend from claims 1, 8, and 15, respectively. Accordingly, Applicant requests

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that the rejection of claims 3, 6, 7, 10, 13, 14, 17, 20, and 21 be withdrawn as depending from claims 1, 8, and 15.

In addition, claim 6 as amended states:

"logic to identify an alternate section in the template that includes a plurality of second input items, each of the second input items being marked by an alternate section tag and an ending alternate section tag, and each of the alternate section tags having a priority associated therewith, the priority determining an order for listing the associated second input item in the graphical user interface.

Applicant asserts that Parekh fails to show or suggest identifying an alternate section in the template that includes a plurality of second input items, where each of the second input items is marked by an alternate section tag and an ending alternate section tag, and each of the alternate section tags having a priority associated therewith. The priority determines an order for listing the associated second input item in the graphical user interface. Accordingly, Applicant requests that the rejection of claim 6 as amended be withdrawn. In addition, claims 13 and 20 have been amended in a manner similar to claim 6 above. Accordingly, Applicant requests that the rejection of claims 13 and 20 as amended be withdrawn.

Claims 22, 24-27, 29-32, and 34-36 stand rejected under 35 U.S.C. §102(e) as anticipated by or, in the alternative, under 35 U.S.C. §103(a) as obvious over Parekh. The standard for anticipation under §102 is stated above. With respect to the rejection under §103, a prima facie case of obviousness is established only when the prior art teaches or suggests all of the elements of the claims. MPEP §2143.03, In re Rijckaert, 9f 3d 1531, 28 U.S.P.Q. 2d 1955, 1956 (Fed. Cir. 1993). For the reasons that follow, Applicant asserts that the rejection of claims 22, 24-27, 29-32, and 34-36 is improper.

As an initial matter, it is noted that the Advisory Action of March 11, 2004 fails to address the arguments provided relative to claims 22, 24-27, 29-32, and 34-36. Accordingly, the arguments and amendments to claims 22, 24-27, 29-32, and 34-36 are represented herein.

Specifically, claim 22 as amended provides the following:

22. A system for generating a graphical user interface (GUI), comprising:
a processor circuit having a processor and a memory;
GUI generation logic stored in the memory and
executable by the processor, the GUI generation logic comprising:

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logic to identify an input item with a default value in a template, the template representing a document in a markup language file; and
logic to generate the graphical user interface from the template that displays the document as the document appears when printed with an input field included within the document, the input field being associated with the input item, and the default value being initially displayed in the input field.

In this respect, the Office Action states:

"Parekh discloses logic to generate an input field in the graphical user interface, as the document would appear when printed, or in the printed information as displayed on the screen represented as the document; the input field being associated with an input item is a template, wherein the screen elements represented the appearance of the documents which are printed and displayed on the screen (page 2, paragraph 19, lines 1-10). (Office Action, page 6).

Applicants respectfully disagree. Specifically, at paragraph 19, lines 1-10, Parekh states:

"With regard to designing customer screens, the screen object (created by either the navigation shell or the mini-application) defines the customer screen. The screen object initializes screen elements from the screen definition file and the canonical template file, using canonical template files to create its dependent objects. The screen object displays three of its properties: language object, screen ID, and template ID. The language object property identifies the language to be used, the country the application will run in, any regional properties, among others."

Applicants assert that nowhere in paragraph 19 cited above does Parekh disclose identifying an input item with a default value in a template and where the template represents a document in the markup language file and generating a graphical user interface from the template that displays the document as the document appears when printed with an input field included within the document, the input field being associated with an input item and a default value being displayed in the input field. For example, where is it that the document is displayed in the graphical user interface as it appears as printed?

Rather, paragraph 19 merely discusses designing customer screen with screen objects defining customer screens. In particular, screen objects display three properties, language object, screen ID, and template ID. Nowhere does Parekh discuss displaying a document as part of a graphical user interface as the document

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appears when printed and including an input field associated with an input item in the template with a default value displayed in the input item.

Accordingly, Applicants assert that the rejection of claim 22 is improper. Correspondingly, Applicants assert the rejection of claims 27 and 32 as improper as including subject matter similar to claim 27 as amended. Applicants respectfully requests that the rejection of claims 22, 27 and 32 as amended be withdrawn. In addition, Applicants request that the rejection of claims 24-26, 29-31, and 34-36 be withdrawn as depending from claims 22, 27, and 32, respectively.

In addition, claim 24 provides for "logic to position the input field within the document based upon a set of location coordinates associated with the input item in the template." Claims 29 and 34 cite subject matter similar in scope with that of claim 24. With reference to claims 24, 29, and 34, the Office Action states:

"Parekh discloses information for the position of the logic input field within the document (page 3, paragraph 44, lines 6-8)." Parekh does not disclose the location coordinates. Parekh may not explicitly state that location coordinates are used to set the location of the elements of a graphical user interface. But Parekh does implicitly state that location information within a display is used, wherein concerning graphical user interface and windows of a computer display screen, it is obvious that these areas are described in terms of location coordinates. Hence it is obvious that pixel locations of a graphical user interface are described using location coordinates and hence, Parekh's place holders for the screen elements will be based on location coordinates." (Office Action page, page 7)

Applicant respectfully disagrees, at page 3, paragraph 44, lines 6-8, Parekh states: "the file has placeholders for each of the screen elements identified in the CTF. The device template and the screen content are merged before the resulting data (usually HTML) is displayed."

Applicant asserts that in neither the above excerpt from Parekh, nor anywhere else in Parekh is there a discussion of positioning an input field within the document that is displayed as the document appeared when printed based upon a set of location coordinates associated with the input item in the template. Rather, the Parekh discusses merging a device template and screen content for display. Accordingly, Applicant asserts that the rejection of claims 24, 29, and 34 is improper. Accordingly, Applicant requests that the rejection of claims 24, 29, and 34 be withdrawn in addition to the reasons described above.

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In addition, claim 25 includes "logic to write a received input value over the default value of the input item." In this respect, an input value typed in using the graphical user interface is inserted over the default value originally displayed in the document that is displayed as printed. It is noted that claims 30 and 35 also include subject matter similar in scope with claim 25.

In this respect, the Office Action states "referring to claims 25, 30 and 35, Parekh discloses a means for receiving an input item value and replacing the default value of the input item with it (page 6, paragraph 100)." (Office Action, page 7).

Applicants respectfully disagree. At paragraph 100, Parekh states:

"basic TextRULE—a rule predefined to handle substitution for text. This rule tells the screen template generator to insert a separate <TXT ID=xxx> token for the text. The text will also be removed before a token is written to the DTF file."

Applicant asserts that the rule described in paragraph 100 of Parekh describes the replacing text with a token. In this respect, the text is stored separately and the token incorporates a reference ID that associates the text with the position in the template.

Contrastingly, an input value that is entered by a user into the graphical user interface as described with reference to claim 22 is written over the default value that is originally displayed. The default value is not retained, and no token that refers to it is incorporated. Accordingly, Parekh fails to show or suggest logic that writes a received input value over the default value of an input item. Accordingly, Applicant asserts that the rejection of claims 25, 30, and 35 is improper. Accordingly, Applicant requests that the rejection of claims 25, 30, and 35 be withdrawn for this reason in addition to the reasons discussed above.

In addition, claims 22, 27, and 32 have been amended herein to correct an inadvertent error. Specifically, these claims have been amended to reflect the fact that a default value is initially displayed in an input field and not an input item.

Also, claims 7, 14, and 21 have been amended herein to provide antecedent basis for the graphical user interface.

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Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted,



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